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*Attorneys for Defendants Estate of Seymour Epstein,  
Muriel Epstein, as Executrix of the Estate of Seymour  
Epstein and as Trustee of the Trusts created by the Last  
Will and Testament of Seymour Epstein and Shelburne  
Shirt Company, Inc.*

**UNITED STATES BANKRUPTCY COURT FOR  
THE SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of  
Bernard L. Madoff Investment Securities LLC

Plaintiff,

v.

ESTATE OF SEYMOUR EPSTEIN, MURIEL  
EPSTEIN, as Executrix of the Estate of Seymour  
Epstein, and as trustee of Trusts created by the Last  
Will and Testament of Seymour Epstein, HERBERT  
C. KANTOR, as trustee of Trusts created by the Last  
Will and Testament of Seymour Epstein, and  
SHELBURNE SHIRT COMPANY, INC.,

Defendants.

Adv. Pro. No. 08-01789 (SMB)  
SIPA LIQUIDATION  
(Substantively Consolidated)

Adv. Pro No. 10-04438 (SMB)

**DECLARATION OF HELEN DAVIS CHAITMAN IN SUPPORT OF DEFENDANTS'  
MOTION TO WITHDRAW THE REFERENCE**

HELEN DAVIS CHAITMAN hereby declares, under penalty of perjury pursuant to 28 U.S.C. § 1746, as follows:

1. I am a member of the bars of New York and New Jersey, and of this Court. I am a member of Chaitman LLP, counsel for Defendants Estate of Seymour Epstein, Muriel Epstein, as Executrix of the Estate of Seymour Epstein and as Trustee of the Trusts created by the Last Will and Testament of Seymour Epstein and Shelburne Shirt Company, Inc. ("Defendants").

2. I submit this Declaration in support of Defendants' motion to withdraw the reference pursuant to 28 U.S.C. § 157(d) and Rule 5011 of the Federal Rules of Bankruptcy Procedure.

3. Attached hereto as **Exhibit A** is a true and accurate copy of the Complaint filed by the Trustee, dated November 30, 2010.

4. Attached hereto as **Exhibit B** is a true and accurate copy of Defendants' Answer and Affirmative Defenses, dated September 16, 2015.

Dated: New York, New York  
February 14, 2020

/s/ Helen Davis Chaitman  
Helen Davis Chaitman